

## UNITED STATES DISTRICT COURT

for the  
Southern District of OhioFILED  
RICHARD W. NAGEL  
CLERK OF COURT  
7/8/21In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)THE LIBERTY MOTEL  
4101 KEATS DRIVE, ROOM #211  
DAYTON, OHIO 45414

Case No. 3:21MJ251

U.S. DISTRICT COURT  
SOUTHERN DIST. OHIO  
WEST. DIV. DAYTON

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

SEE ATTACHMENT A

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

SEE ATTACHMENT B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Offense Description

18 U.S.C. §§ 2, 371, 1028A, 1029 & 1708  
42 U.S.C. § 408(a)(7)(B)Conspiracy, Identify Fraud, Access Device Fraud and Theft of Mail  
Social Security Fraud

The application is based on these facts:

SEE AFFIDAVIT IN SUPPORT

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

SA CLAYTON MIDDLETON, U.S. SECRET SERVICE

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
FaceTime (specify reliable electronic means)

Date: 7/8/21

City and state: DAYTON, OHIO

SHARON L. OVINGTON, U.S. MAGISTRATE JUDGE

Printed name and title



**AFFIDAVIT**

I, Clayton Middleton, after being duly sworn, hereby depose and state as follows:

1. I make this affidavit in support of an application for a search warrant pursuant to Rule 41 of the Federal Rules of Criminal Procedure. The specific premises to be searched is specifically described in Attachment A to this application. The specific personal property sought to be searched and seized is described in Attachment B to this application.
2. I am currently a Special Agent (SA) with the United States Secret Service (USSS) and have been so employed since November, 2007. I am currently assigned to the Dayton (OH) Resident Office. I have received extensive training in conducting criminal investigations of various offenses set forth in Title 18 of the United States Code. I have attended and completed various courses of study administered at the Federal Law Enforcement Training Center in Glynco, Georgia, and the James J. Rowley USSS Training Center in Laurel, Maryland. Prior to joining the USSS I was employed as a Detective with the Sidney, OH Police Department.
3. The facts set forth in this affidavit are based upon my personal knowledge of the subject investigation; my exposure to other relevant facts gathered during the course of this investigation shared with me by other law enforcement officials associated with the USSS and the Dayton Police Department's (DPD) Financial Crime Unit; my review of various law enforcement reports of investigation that have been generated in this case, together with my personal conversations and discussions with the primary case agents in this matter, to wit: DPD Detective Lindsey Dulaney, and USSS Senior Special Agent (SSA) Jennifer M. Tron.
4. This affidavit is intended to only show that there is sufficient probable cause to justify the issuance of the requested search warrant, and is not intended to set forth all of my knowledge about this pending investigation.
5. On or about April 6, 2021, the USSS Dayton Resident Office opened a formal investigation into a suspected Dayton, Ohio based criminal conspiracy which was believed to be involved in the commission of a wide range of fraudulent activities to include: access device fraud, aggravated identity theft, mail theft, possession of stolen U.S. Mail and social security fraud. The prime suspects and participants in this suspected criminal conspiracy have been identified to be a Myrtle Lynn Jackson aka "MiMi" and her boyfriend Joshua Dylan Chapman aka "JoJo". It is believed that this criminal conspiracy first began its criminal activities soon after the Memorial Day, 2019 Tornadoes which severely impacted the Greater Dayton, Ohio area.
6. This investigation has revealed that the criminal conspiracy stole a wide range of Personal Identification Information (PII) from various elderly and otherwise vulnerable local area victims as well as miscellaneous tornado victims. The conspirators then used this stolen PII to fraudulently access and withdraw large amounts of money from various victims' credit card, debit card, gift card, personal checking, bank, social security and insurance

accounts. There are at least 48 documented victims who have suffered at the hands of this criminal conspiracy.

7. On May 11, 2021, the Grand Jury returned a 17-count indictment against both Jackson and Chapman. (*See* Case No. 3:21-cr-55). This indictment alleged violations of various conspiracy, identify fraud, access device fraud, theft of mail, and social security fraud related charges as set forth in: 18 U.S.C. §§ 2, 371, 1028A, 1029 and 1708, together with 42 U.S.C. § 408(a)(7)(B).
8. On January 15, 2021, Deputies from the Montgomery County Sheriff's Office made contact with Ms. Jackson at her then place of residence located in Room #211 at the Liberty Motel, 4101 Keats Drive, Dayton, OH 45414. During this contact visit it was discovered that both Ms. Jackson and Mr. Chapman were then cohabitating in said motel room. As a result of this visit, various items of incriminating documentary evidence was seized to include a detailed handwritten ledger labeled "Important Shit Bruh". This ledger contained the stolen PII of over 150 separate individuals. Over 22 additional individuals appearing in said ledger had their personal credit card, loan and unemployment benefits accounts victimized by acts of fraud committed by the conspiracy.
9. As a result of subject investigation, both Ms. Jackson and Mr. Chapman were arrested and remain detained in the Montgomery County Jail pending trial.
10. The Montgomery County Jail is equipped with an inmate telephone taping system referred to as the Paytell System. This system allows corrections officer and law enforcement officials to monitor inmates telephone conversations. Every telephone call which is placed with the Paytell System begins with a recorded oral warning to all participants that indicate the personal telephone conversations are subject to law enforcement monitoring.
11. On July 6, 2021, Detective Lindsey Dulaney personally monitored a jail telephone conversation between Ms. Jackson and a close friend of hers identified as Roger Flannery. The call file for this recorded conversation is labelled as: P\_13\_5243\_1\_2021076140602. In this particular conversation, Ms. Jackson contacted Mr. Flannery at approximately 2:06 PM using telephone no. (937) 250-3919. During the course of this conversation, it was revealed that Mr. Flannery was then occupying Room #211 at the Liberty Motel. Ms. Jackson advises Flannery that this is the same room she and Chapman had occupied prior to their arrests. At approximately 8:40 into this conversation, Ms. Jackson advises Mr. Flannery that she hid various items above the ceiling tile in that motel room. She describes these items as "boxes, suitcases and a spare tire." Mr. Flannery indicated that he will check the ceiling later after he has "cooled off."
12. It is your Affiant's belief that probable cause exists to believe that these said items of personal property purportedly stashed by Ms. Jackson above the ceiling tiles in Room #211 at the Liberty Motel, located at 4101 Keats Drive, Dayton, OH 45414 represent possible evidence of crime, contraband, fruits of crime, or other items illegally possessed, or other property designed for use, intended for use, or used in committing crimes to include: conspiracy, identify fraud, access device fraud, theft of mail, and social security fraud

related charged including: 18 U.S.C. §§ 2, 371, 1028A, 1029 and 1708, together with 42 U.S.C. § 408(a)(7)(B).

13. As such, your Affiant respectfully requests that this Honorable Court issue the requested search warrant for said motel room described in Attachment A, for various items described in Attachment B.

Respectfully submitted,



Clayton Middleton,  
Special Agent, U.S. Secret Service

Sworn to before me this 8th day of  
July, 2021.



Sharon L. Ovington  
United States Magistrate Judge



**ATTACHMENT A**

The specific property/premises to be searched consists of a single motel room (inclusive of both the main general living area, and the area located above the ceiling tiles of subject motel room) all located at THE LIBERTY MOTEL, 4101 KEATS DRIVE, ROOM #211, DAYTON, OHIO 45414. The subject premise is a single story 10-unit motel located at the northeast corner of Neff Rd. and Keats Dr. situated in Harrison Twp., Montgomery County, Ohio. Room #211 is specifically identified as a corner unit with the number “211” located on the entry door.

**ATTACHMENT B**

Any and all documentary records, books, papers, ledgers, notes, correspondence, containing personal identifying information (PII) of third party individuals, to include, but not limited to: names, addresses, telephone numbers, credit card account numbers and information, debit card account numbers and information, gift cards and related information, social security numbers and/or account information, financial institution account records, statements, and related information, personal check books, checking account documentation and/or account information, insurance policy numbers and related information, stolen U.S. Mail matter, receipts, bills, U.S. Currency, gambling receipts and records, car registration and rental records, lease agreements, retail receipts, tax records, contraband, firearms, motel receipts, and any other stolen third party personal property.